

I feel that the current iBiquity IBOC High Definition Radio proposal for authorization during night hours on the U.S.A AM band would cause significant interference to existing analog AM monaural and AM stereo stations in the U.S.A. This would especially degrade listening quality on higher quality AM receivers with wideband AM audio frequency response to 10 kiloHertz. IBOC would also reduce usable listening range for all affected AM stations. This IBOC implementation precludes all existing AM analog stereo broadcasting on IBOC stations. Consumers would be forced to purchase new IBOC receivers to listen to AM digital stereo broadcasts. In addition, virtually every AM medium wave consumer analog receiver and tuner has Automatic Gain Control (AGC) circuitry. These IBOC sidebands, as transmitted, are within 15dB down from 10.2 kHz to 15 kHz with respect to the station's carrier center frequency; however, the NRSC-2 specifications were designed for non-continuous energy to be placed within this band, constituting splatter to first adjacent AM channels. IBOC iBiquity HD Radio places continuous energy in the form of digital data in these sidebands between 10.2kHz and 15kHz. It is this continuous energy that was never considered to neighboring AM stations when NRSC-2 was approved. AGC stages in the receiver and tuner, sensing a weaker signal, will automatically increase the amplitude of the HD radio sideband continuous energy digital signals in the 10.2kHz to 15kHz area of the spectrum. This pronounced AGC action causes a very loud roaring "hash" FM-type static sound, often louder in amplitude than the main analog audio programing, to be heard from these receivers. These continuous energy sidebands also force digitally-tuned receivers to seek and scan the AM radio station's first and second adjacent frequencies, thus defeating the purpose of the seek and scan functions of virtually all digitally-tuned radio tuner or radio receivers currently in the marketplace. Until widespread proliferation of IBOC High Definition Radios occurs in the marketplace, perhaps in 20 years, we as consumers must endure the constant annoying "hash" sounds of the first and second adjacent AM frequencies of HD AM Radio stations, and the deactivation of the seek and scan functions in our digitally-tuned AM radios and tuners. In conclusion, this continuous energy placed in the sidebands of HD Radio transmitting stations causes significant interference to first adjacent AM stations, and the existing FCC AM channel spacing and allocations never considered constant energy placed within the 10.2kHz to 15kHz region. Therefore, this is a very poor introduction for digital broadcasting that provides very little consumer benefit, is not compatible with analog AM receivers and tuners, and causes significant and increased interference to existing analog AM monaural and AM stereo stations, especially on immediate adjacent frequencies to IBOC HD Radio operated stations. As an avid DXer (someone who listens to outstate AM stations), I am against this night-time authorization for the IBOC High Definition Radio technology on the AM broadcast band, until iBiquity demonstrates that continuous transmitted energy is unnecessary to be placed in the guard band between 10.2kHz and 15kHz on either lower or upper sideband of an AM station's main carrier center frequency. Sincerely, Jeff Deck